

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)**

GETIR US, INC.,

and

GETIR PERAKENDE LOJISTIK A.S.,

Plaintiffs,

v.

JOHN DOE

and

getir190.com, a domain name

and

190getir.com, a domain name,

Defendants.

Civil Action No. 1:21-cv-1237 (RDA/TCB)

**SUPPLEMENTAL DECLARATION OF DAVID KING**

I, David King, am over the age of 18 and competent to testify to the matters below:

1. I am the founder and Chief Executive Officer of Digitalis Media Ltd, a specialist firm whose technology and analysis are used by corporations and governments to track, analyze and mitigate the impact of harmful content online.

2. I am a recognized authority in IT, cyber risk, and online reputation, and I often advise the boards of global organizations and political institutions on reputational attacks, digital integration, and cyber risk.

3. All the statements in my prior declaration (Dkt. 4) are true and accurate and incorporated by reference herein.

4. This Declaration serves to supplement my findings based on additional developments following the filing of my declaration on November 8, 2021.

5. Since the filing of my declaration, Digitalis was retained to assist in evaluating the activities occurring in connection with the website identified at [www.190getir.com](http://www.190getir.com) (“190Getir”).

6. A true and correct screenshot from 190Getir shortly after the time the domain name was registered is attached as **Exhibit 1**.

7. It is my opinion that there are sufficient commonalities between Getir190 and 190Getir that suggest with a high degree of confidence that the same individual or entity is behind the creation of both websites.

8. In this case, I have been able to ascertain that 190Getir was registered through NameSilo, LLC, a domain name registrar headquartered in Phoenix, Arizona on November 11, 2021 at 0700 GMT.

9. 190Getir was registered through a domain name registrar, where the registrant then used, in the same manner as that used to register Getir190, a related service to cloak registration details behind a privacy shield. *See Exhibit 2* (screenshot from WhoIs lookup showing that the “Registrant Name” is “Domain Administrator” and Registrant Organization is “See PrivacyGuardian.org”)

10. As explained previously, this is at odds with the transparent registration process typically used by corporations in the normal manner of business, the details ordinarily submitted through which allow third parties to identify the owner of a website and which would ordinarily provide points of contact for each of general enquiries and technical matters relating to a website. As a result of the anonymity, I have been unable, despite diligence, to ascertain the true identity or contact details of the registrant.

11. There are a number of circumstantial similarities between 190Getir and Getir190.

12. First, the registration for 190Getir took place on or around November 11, 2021, which is three days after the Complaint in this case was initially filed. Second, the registration for Getir190 took place on October 14, 2021, at 0727 while the registration for 190Getir took place on November 11, 2021, at 0700, which suggests that the registrant for the two sites is in the same time zone despite potentially being in a different part of the world. Third, Getir190 was updated on November 11, 2021 to restrict domain transfers, and 190Getir was registered less than 12 hours later.

13. Like getir190, 190getir was designed rapidly on the Wordpress platform and its color palette and use of embedded video from a third-party platform is analogous.

14. It is my opinion that the content uploaded to 190getir is highly likely to have been intended to achieve as quickly as possible an immediately “live” web site, essentially minimising the downtime between getir190 being publicly visible and 190getir being available in its place, with the intention thereafter of adding content to build out the site, as was the case with getir190.

15. The author of the content on 190getir impliedly claims ownership of getir190 in claiming that “Getir has successfully removed **our** content”; “Getir190.com has been deplatformed”; “**We’ve** been taken down for ‘defamatory content’”; “**our** web site was taken down”; “**our** video evidence... was taken down.” (emboldened emphasis added by me).

16. 190getir also promises its visitors that the site will bring their “campaign back online.”

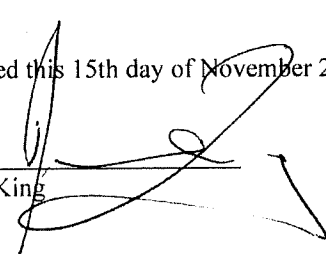
17. Its author also claims responsibility for “stickers” aimed at “trying to wake up the public” which they say were taken down. I can only assume this is a reference to the posters

distributed in and around London, which posters contained a QR code designed to link directly to getir190.

18. I have no doubt that 190getir was created to and is intended to create an immediate replacement for getir190. Although the websites themselves do not appear sophisticated, the use of individual and distinct specialisms in video production, social media integration, search engine optimization and the level of coordination with content across multiple platforms and channels (both on- and offline), coupled with immediate, effective responses to content removal and offline activities in the real world, is sophisticated, and demonstrates a well-resourced campaign that is developing very quickly in terms of its effect. In my opinion, this is a coordinated, anonymous, defamation attack campaign between Getir190 and 190Getir that is designed only to cause harm and to maximize the same. This newly and rapidly deployed web site further confirms the perpetrator's commitment and resources. If allowed to continue in its current form the effect of this site and the attack campaign of which it is a part will scale rapidly upward and be highly difficult, if at all possible, to mitigate. The best chance to mitigate is for the site to be removed immediately and, given the coordinated efforts as described above, to prevent further publication and/or promotion of the same content currently being distributed.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 15th day of November 2021 in Palma de Mallorca, Spain.

  
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David King